

**United States Court of Appeals
for the District of Columbia Circuit**

No. 24-1113

(and Consolidated Cases 24-1130 & 24-1183)

TIKTOK INC. and BYTEDANCE LTD.,

Petitioners,

v.

MERRICK B. GARLAND, in his official capacity as
Attorney General of the United States,

Respondent.

(For Continuation of Caption See Inside Cover)

*On Petition for Review of Constitutionality of the Protecting
Americans from Foreign Adversary Controlled Applications Act*

**NOTICE OF INTENT TO FILE AMICUS BRIEF OF *AMICI CURIAE*
PROFESSORS MUELLER, EDGAR, AARONSON, AND KLEIN IN
SUPPORT OF PETITIONERS**

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June 27, 2024

BRIAN FIREBAUGH, *et al.*,

Petitioners,

v.

MERRICK B. GARLAND, in his official capacity as
Attorney General of the United States,

Respondent.

BASED POLITICS INC.,

Petitioner,

v.

MERRICK B. GARLAND, in his official capacity as
Attorney General of the United States,

Respondent.

NOTICE OF INTENT TO FILE AMICUS BRIEF

Pursuant to Fed. R. App. P. 29(a), D.C. Circuit Rule 29(b), *amici curiae* Professors Milton Mueller, Timothy H. Edgar, Susan A. Aaronson, and Hans Klein represent that they intend to participate in this case as *amici curiae*. Petitioners and Respondents have consented to the filing of this *amicus* brief. *Amici* are internationally prominent scholars and professors specializing in AI, cybersecurity, data governance, international public affairs, internet governance, and national security.

Amici respectfully submit that this notice is timely filed under D.C. Circuit Rule 29(b). *Amici* intend to file their brief no later than June 27, 2024 in accordance with D.C. Circuit Rule 29(c). Pursuant to D.C. Circuit Rule 29(d), *amici* certify they are not aware of any other amicus brief addressing the subject of this brief—in particular, the unique viewpoints of scholars and professors on the impact of the TikTok Ban on the First Amendment and the factual underpinning of the Ban from a cybersecurity, data governance, international public affairs, internet governance, and national security perspective. A separate brief is necessary to permit *amici* joining this brief to offer their perspectives on the issues before the Court.

DATED: June, 27 2024

Respectfully submitted,

/s/ Mark Davies

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CERTIFICATE OF SERVICE

I hereby certify that on June 27, 2024, I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals using the CM/ECF system. I further certify that service upon all counsel of record was accomplished by electronic filing via the CM/ECF system.

DATED: June 27, 2024

/s/ Mark Davies
Mark Davies